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### REMARKS

Applicants appreciate the further examination provided by the Final Office Action of November 22, 2005. In particular, Applicants appreciate the Examiner's withdrawal of the claims objections and the section 112 rejections. As the rejections appear to be identical to the rejections in the previous Office Action of June 14, 2005, Applicants will limit the present response to addressing the "Response to Arguments" section of the Final Office Action. However, the entire relevant contents of Applicants' Amendment of September 14, 2005 (hereinafter "Applicants' previous Amendment") is hereby incorporated herein by reference as if set forth in its entirety. Applicants maintain that the pending claims are patentable over the cited references for at least the reasons discussed herein and in Applicants' previous Amendment and, therefore, respectfully request that the Examiner withdraw the rejections with respect thereto and allow the pending claims.

#### Response to Arguments

The Final Office Action states that Applicants' argument that Rao does not disclose or suggest the recitations of, for example, Claim 1, is not persuasive. *See* Final Office Action, page 2. Applicants are not disputing that the presence of source and destination addresses in a packet header are not new. Furthermore, Applicants agree that translation of embedded address information is also known. However, Claim 1 of the present application recites, in part, "translating Internet Protocol (IP) addresses located in a payload of the packet if at least one of a source address and a destination address located in a packet header has been previously translated." Nothing in Rao discloses or suggests at least the highlighted recitations of Claim 1.

In particular, Rao discusses an IP packet including an IP header 32 (protocol 40), a transport header 34 (including a source port 42 and a destination port 44) and payload data (including embedded address 46 and keyword 48). *See* Rao, Figure 2 and corresponding text. The keyword 48 indicates "the existence of application specific embedded addressing information in the payload data 36." *See* Rao, column 4, line 6-8. Furthermore, as discussed in Rao:

Referring to FIG. 4, the method begins at step 90 in which a packet 30 is received at the router 16. Generally described, translation happens from upper layers down i.e. application payload translation happens first and

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**then transport protocol header and then IP protocol header will be translated.** This is because, modifications to the payload data due to address information translation can result in changes to the transport protocol header and IP protocol header.

See column 5, lines 52-59. In other words, if a "keyword" is identified in the payload, the payload is translated and THEN the transport protocol header (including source address and address) is translated. Thus, Rao cannot translate the payload if at least one of a source address and a destination address located **in a packet header** has been previously translated, because the payload is translated first.

The Final Office Action further states:

Accordingly, by disclosing that addressing information which has been translated is "embedded into the payload data 36" (col. 6, lines 31-32), and by disclosing a species identifies packets having such embedded addressing information, it follows that the species identifier in Rao clearly identifies packets with addressing information that inherently have previously been translated. Accordingly, applicant's argument that Rao does not teach the "previously translated" limitation in applicant's claim 1 is not persuasive.

See Final Office Action, page 3. Applicants do not dispute that Rao discloses payload data including embedded addresses or that the keyword field 78 forms a packet species, *i.e.* which packets contain embedded information. See Rao, column 5, lines 19-22. However, as discussed above, if the keyword indicates that the payload includes embedded information, the packet is considered the "type" of payload "capable of including embedded addressing information 46." See Rao, column 6, lines 5-6. And again, the payload is translated first and then the packet header is translated. In stark contrast, Claim 1 recites translating the payload if the source and/or destination address in the header has already been translated. Nothing in Rao discloses or suggests translating the payload based on whether or not the source and/or destination address has already been translated as recited in Claim 1.

Accordingly, Applicants respectfully submit that independent Claims 1, 34, 49 and 50-52 are patentable over Rao for at least the reasons discussed above and in Applicants' previous Amendment.

With respect to Claim 34, the Final Office Action states that "it is generally considered to be within ordinary skill in the art to shift the location of parts absent a showing of unexpected results." See Final Office Action, page 3. However, as

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discussed in Applicants' previous response, some embodiments of the present invention may be used to bypass the header translation at the NAT between service providers (CNAT 340, Figure 3) that had previously been done at the NAT associated with the customer's network (NAT Device 330, Figure 3). If all the NAT is performed at a single device, as in Rao, there would be no need to determine if an address in the header had been previously translated, as all the translation is done in one place, so by definition nothing will have been previously translated. Thus, one of skill in the art would not be motivated to split up the operations of the device discussed in Rao as suggested in the Final Office Action. Furthermore, even if the operations of the device in Rao were split, the recitations of Claim 34 would still not be met for at least the reasons discussed above with respect to Claim 1. Accordingly, Applicants submit that independent Claim 34 is patentable over the cited combination for at least these additional reasons.

Finally, the Final Office Action states that:

Srisuresh provides clear motivation to combine, and the motivation relied upon by the Examiner in the rejection of applicant's claims is that of Srisuresh's, not Examiner's own subjective belief or unknown authority as asserted by applicant.

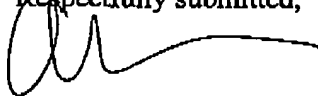
See Final Office Action, page 4. However, Applicants submit that the question to be answered is would one of skill in the art be motivated to combine the references without using Applicants' disclosure as a guide. The fact that Srisuresh would "provide reduced cost of equipment..." (Final Office Action, page 4) is a reason why the combination of Srisuresh and Rao may be beneficial to the teachings of Rao, but is not a motivation to combine the references. If this motivation were adequate to meet the office's burden, then any reference that could provide a "reduced cost" to the teachings of another reference would render the combination of the two references obvious, this cannot be the standard. Accordingly, Applicants respectfully submit that there is no motivation to combine the cited references as suggested in the Final Office Action for at least the reasons discussed herein and in Applicants' previous Amendment.

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### CONCLUSION

In light of the above discussion, Applicants submit that the present application is in condition for allowance, which action is respectfully requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (919) 854-1400.

Respectfully submitted,



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